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EPA and NJDEP Comments on the 2nd Semiannual Monitoring Report 2014
Dayco Corp./L.E. Carpenter Site, Wharton, New Jersey

1. Only routine monitoring results should be reported in the semiannual reports. Any results related to additional contaminant delineation, pilot studies, etc. must be reported in a separate, standalone document (report, technical memo or letter report format). Also, please note that, whenever possible, documents should be printed double-sided to reduce paper consumption.

2. In light of the recent (and possible planned) transfers in parcel ownership, a current property ownership map should be included in future monitoring reports.

3. The figures in the report are confusing since they include different units for the various media compared to the text and tables. All groundwater, pore water, and surface water results should be reported in µg/L and all sediment results should be reported in mg/kg. In addition, there appear to be inconsistencies in the identification of sampling locations. All text, figures and tables should be evaluated for nomenclature and unit consistency. The following are examples of discrepancies found in the document:

    a. Figure 8 shows two locations of SW-R-2-MC as well as an SW-R2 and SW-R-2.

    b. Figure 7 illustrates that pore water sample PW-R9 was found to have 0.009 mg/L of DEHP. However, in Table 7 this location is listed as PW-R-9 and the DEHP concentration is reported as 1.9 mg/L. It's not clear if this is the same sample location.

    c. The text on page 5-3 and Table 9 show the concentration of DEHP as 1.6 ppm for sampling location SED-R-2-MC, but Figure 8 shows the concentration as 1,600 ppm.

4. Adverse site conditions such as low recharge and physical obstacles were encountered during the temporary well point installation. As a result, much of the planned sampling was unable to be completed. Due to the apparent difficulty in installing and obtaining groundwater samples from temporary well points, any future ground water investigations in the wetland area must include the installation of permanent monitoring wells for contaminant delineation. All monitoring wells must be vertically profiled.

5. The report notes that no free product was detected in any of the wetland area wells; only one groundwater sample was able to be collected from the well point sampling, and that sample contained DEHP above the New Jersey Ground Water Quality Criteria (NJGWQC), but only in the unfiltered sample. It is recommended that both filtered and unfiltered samples be analyzed to determine if the detected DEHP is from the soils/sediments or whether it is actually present in the groundwater at levels exceeding criteria.

6. Four samples (rather than the nine planned) were collected and analyzed for BTEX. Ethylbenzene and total xylenes were detected, but not at levels exceeding groundwater standards. Please clarify whether these results exceed surface water standards.

7. The report states that sampling results indicate migration of DEHP into and within the Rockaway River is not an on-going concern. This statement may be premature as DEHP was found in the sediments, pore water and surface water samples from the river; DEHP in surface water sample SW-R1 (2.9 ppb) exceeded the New Jersey Surface Water Quality Criteria (NJSWQC) of 0.95 ppb. Therefore, additional evaluation of DEHP in the Rockaway River media (pore water, surface water and sediment) should be conducted to determine potential impacts from the wetland area. An ecological evaluation of the Eastern Drainage Ditch is also warranted since DEHP was detected in the sediment samples collected from the ditch during the 2011 Focused RI and Treatability Study as well as in recent surface water samples.

8. Pore water and groundwater samples adjacent to the river must be evaluated against NJSWQC, not NJGWQC. The results of all potentially affected samples (pore water, groundwater and surface water) must be reevaluated, including those that may have been omitted from figures because they were below the NJGWQC [e.g., sample SW-D-5 in 3Q14 (see page 7 of 52 in Appendix B vs Figure 5A)]. The technical basis for evaluating groundwater and pore water data against FW2 SWQC can be found in Sections 5.4 and 6.2.3 of NJDEP's August 2012 *Ecological Evaluation Technical Guidance*. The entire document may be found at http://www.nj.gov/dep/srp/guidance/srra/ecological_evaluation.pdf. The human health and ecological NJSWQCs for DEHP are 1.2 µg/L and 0.3 µg/L, respectively

9. Data qualifiers outlined in Appendix B indicate that sample results from 3Q14 may be biased low or high due to factors such as unpreserved VOC samples, low surrogate recoveries, or potential false positives. These potential issues need to be considered in the overall evaluation of the MW-30 area.

10. The report recommends the expansion of the phytoremediation pilot study to a full-scale remediation of the MW-30 area. Contamination in the wetland area must be fully delineated and a report providing an evaluation of the pilot study must be submitted before a determination can be made on whether the pilot should be expanded. The report should present both pre-pilot study and post-pilot study groundwater data. In order for the pilot to be expanded, the results of the study must clearly demonstrate a decline in contaminant levels resulting from the uptake of contaminants by the trees.

11. Similarly, it should be noted that in order for MNA to be selected as the final sitewide groundwater remedy, an MNA evaluation report will ultimately need to be prepared to clearly show evidence of a decline in contaminant levels due to natural attenuation processes.